UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	Criminal No. 4:20-CR-446
v.	§	
	§	KEITH P. ELLISON
YAVONNE HAND and	§	Judge
NIKESHA DIXON	§	-
Defendants.	§	Arturo Rivera
	§	Case Manager
	§	
	§	JURY TRIAL
	§	Proceeding

PRELIMINARY EXHIBIT LIST OF THE UNITED STATES OF AMERICA

The United States, by and through the undersigned counsel, discloses its preliminary exhibit list in the above-captioned case. The United States reserves the right to amend this list as it continues to prepare for trial and based on proceedings and rulings in the case.

No.	Description	Offr.	Obj.	Date Admit	Date N/Adm.
	Medicare Data and Information				
1.	Medicare Claims Data January 2016 to December 2017				
2.	Medicare Claims Data January 2018 to December 2018				
3.	Medicare Claims Data January 2019 to January 2020				
4.	Combined Medicare Claims Data				
5.	Web ADR 855B With EFT (January 30, 2018)				
6.	Electronic Fund Transfer Agreement Bank of America (March 17, 2018)				
7.	Novitas Approval Letter for Neighborhood Empowerment and Transformation (dated March 20, 2018)				
8.	Novitas Approval Letter for Neighborhood Empowerment and Transformation (dated June 11, 2019)				

9.	Electronic Data Interchange (March 27, 2018)				
10.	Reassignment of Benefits by Dr. Thompson to NEAT				
11.	Letter Approving Dr. Thompson Reassignment of Benefits				
12.	Novitas Solutions Correspondence and Telephone Tracking Comments for NEAT				
13.	Education Email from Novitas CERT Team to Yavonne Hand (October 19, 2018)				
14.	Education Email from Novitas CERT Team to Yavonne Hand (October 22, 2018)				
15.	Education Email from Novitas CERT Team to Yavonne Hand (December 3, 2018)				
16.	Education Email from Novitas CERT Team to Yavonne Hand (December 18, 2018)				
17.	Education Email from Novitas CERT Team to Nikesha Dixon (December 28, 2018)				
18.	Education Email from Novitas CERT Team to Yavonne Hand (December 31, 2018)				
19.	Education Email from Novitas CERT Team to Germya Heart (January 3, 2019)				
20.	Novitas CERT Team Medical Records Review for NEAT				
	Bank Records		1		
21.	Signature Card for Bank of America Account *8535				
22.	Statements for Bank of America Account *8535				
23.	Signature Card for JP Morgan Chase Account *1657				
24.	Statements for JP Morgan Chase *1657				
	Search Warrant Documents				
25.	Patient Sign-In Binder				
26.	Progress Notes Binder				
27.	Pink Binder with Long Term Patient List and Billing 101				

28.	Terrie Emmitt Composition Notebook of Stories				
Summary Exhibits					
29.	Summary of Count 2 – Charles Bourgeois				
30.	Summary of Count 3 – Josephine Govan				
31.	Summary of Count 4 – Kershalyn Kemp				
32.	Summary of Count 5 – Gillie Rehman				
33.	Summary of Count 6 – Jessie Chase				
34.	Summary of Count 7 – Louis Vitton purchase				
35.	Summary of Count 8 – Chanel purchase				
36.	Summary of Count 9 – Hotel ZaZa purchase				
37.	Summary of Count 10 – Marquee Las Vegas purchase				
38.	Summary of Count 11 – Gucci store purchase				
39.	Summary of Count 12 – Jaguar purchase				
40.	Summary of NEAT Bank Deposits				
41.	Summary of NEAT Bank Withdrawals				
42.	Summary of NEAT Claims Data				
	Photos	1	1		
43.	Search Photos				
44.	Photograph of Yavonne Hand				
45.	Photograph of Nikesha Dixon				
46.	Photograph of Marilyn Monroe-Taylor				
47.	Photograph of Dr. Nema Uwaydah				
48.	Photograph of Dr. Katherine Thompson				
49.	Photograph of Terrie Emmitt				

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50.	Photograph of Sylvester Nwosu				
51.	Photograph of Alexa Lauture				
52.	Photograph of Larry Dixon				
	Patient Files	-	1	•	
53.	NEAT Patient Files for R.H.				
54.	NEAT Patient Files for Y.C.				
55.	NEAT Patient Files for J.G.				
56.	NEAT Patient Files for L.E				
57.	NEAT Patient files for C.B.				
58.	NEAT Patient Files for G.R.				
	Phone Records	 	II.		
59.	Extract from Niquia Bradley Samsung J7 of Text Messages Between Bradley, Hand, and Dixon				
60.	Extract from Niquia Bradley Samsung S9 of Text Messages Between Bradley, Hand, and Dixon				
	Miscellaneous	1	II.	1	
61.	Bradley Composition Notebook (Dior C Cover)				
62.	Bradley Composition Notebook (Niquia Cover)				
63.	Bradley Composition Notebook (Series 1 and 2 Cover)				
64.	Bradely Composition Notebook (New Codes Cover)				
65.	Bradley Composition Notebook (Series 1 & 2 New Series Cover)				
66.	Louis Vuitton Sales Receipt				
67.	Chanel Sales Receipt				
68.	Hotel ZaZa Sales Receipt				
69.	Marquee Las Vegas Sales Receipt				

70.	Gucci Store Sales Receipt		
71.	Momentum Jaguar Volvo Sales Receipt and Check		
72.	Harris County Record of Incarceration for C.B.		
73.	Harris County Record of Incarceration for L.E.		
74.	Harris County Record of Incarceration for J.G.		
75.	Harris County Record of Incarceration for K.K.		
76.	Harris County Record of Incarceration for G.R.		

Respectfully Submitted,

JENNIFER B. LOWERY ACTING UNITED STATES ATTORNEY

By: /s/ Andrew Tamayo

Andrew Tamayo Justin Woodard Trial Attorneys

U.S. Department of Justice Criminal Division, Fraud Section

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Date: October 15, 2021

I hereby certify that a true and correct copy of the foregoing was electronically filed via the Court's Electronic Case File system and emailed to the Assistant Warden at Joe Corley to provide to the defendant on October 15, 2021, and mailed to the defendant at the address below on October 18, 2021.

> Yavonne Hand ID #: 21235509 Joe Corley Detention Facility 500 Hilbig Road Conroe, TX 77301

/s/ Andrew Tamayo Andrew Tamayo Trial Attorney